INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

(317) 232-8603
(800) 451-6027
www.state.in.us/idem

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL

OFFICE OF AIR QUALITY

Dolco Packaging
2110 Patterson Street
Decatur, Indiana 46733

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F001-14652-00032	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: September 11, 2002 Expiration Date: September 11, 2007

TABLE OF CONTENTS

TABLE OF CONTENTS (Continued)

Quarterly Report Form
Quarterly Deviation and Compliance Monitoring Report Form

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary polystyrene extrusion plant.

Authorized individual:	Roger Lichtle
Source Address:	2110 Patterson Street, Decatur, Indiana 46733
Mailing Address:	2110 Patterson Street, Decatur, Indiana 46733
General Source Phone Number:	(219)728-2161
SIC Code:	3086
Source Location Status:	Adams
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) polystyrene food packaging production line consisting of the following:

(1) Nine (9) silos for regrind flake recycling, constructed in 1972, with maximum capacities included in a confidential file, each equipped with a baghouse to control particulate emissions;

(2) One (1) natural gas fired regenerative thermal oxidizer, constructed in 1998, with a maximum capacity of five (5) million British thermal units per hour, to control VOC emissions from thermoforming/molding and the curing room which were all constructed in 1972;

(3) Uncontrolled extrusion and final product storage operations, constructed in 1972, with maximum capacities included in a confidential file;

(b) Eight (8) offset printers, constructed in 1972, with a combined maximum ink usage of 28,000 pounds per year.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Paved and unpaved roads and parking lost with public access;

(b) Enclosed systems for conveying plastic raw materials and plastic finished goods;

(c) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;

(d) Gasoline generators not exceeding 110 horsepower;

(e) Stationary fire pumps; and

(f) Emission units with PM and PM10 emissions less than five (5) tons per year, SO_2, NOx, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:

(1) One (1) butane compressed gas storage tank A, installed in 1990, with a capacity of 15,000 gallons; and

(2) One (1) idle gas storage tank B, installed in 1972, with a capacity of 7,000 gallons, charged with nitrogen to inhibit corrosion.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,
(2) revised, or
(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying,

revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover

the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:
Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ,

may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a frequency, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or

application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) polystyrene food packaging production line consisting of the following:

(1) Nine (9) silos for regrind flake recycling, constructed in 1972, with maximum capacities included in a confidential file, each equipped with a baghouse to control particulate emissions;

(2) One (1) natural gas fired regenerative thermal oxidizer, constructed in 1998, with a maximum capacity of five (5) million British thermal units per hour, to control VOC emissions from thermoforming/molding and the curing room, which were all constructed in 1972;

(3) Uncontrolled extrusion and final product storage operations, constructed in 1972, with maximum capacities included in a confidential file;

(b) Eight (8) offset printers, constructed in 1972, with a combined maximum ink usage of 28,000 pounds per year.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 FESOP Limits [326 IAC 2-8]

Pursuant to F001-7300-00032, issued April 14, 2001, and 326 IAC 8-4 (FESOP), the following apply:

(a) The input of polystyrene to the extruders shall be less than 16,783 tons per twelve (12) consecutive month period and the input of butane as a blowing agent shall be less than 479 tons per twelve (12) consecutive month period. The source shall operate the thermal oxidizer, with a destruction efficiency of ninety-six percent (96%), at all times that the thermoformers/molders, curing, and silos are in operation. This is equivalent to limiting the VOC emissions from the polystyrene food packaging production line to less than ninety-two (92) tons per year. This limit is structured such that when including VOC emissions from the remainder of the source, the source total VOC emissions remain below one hundred (100) tons per year. Therefore the requirements of 326 IAC 2-7 (Part 70 Permit), 326 IAC 2-2 (Prevention of Significant Deterioration), and 40 CFR 52.21 are not applicable.

In order to be in compliance with this limit, the thermal oxidizer shall operate at a minimum destruction efficiency of 96% and at the following capture efficiencies: 84% for curing, 100% for thermoforming, and 100% for the silos. The thermal oxidizer destruction and capture efficiencies together shall yield the following overall efficiencies: 80.61% for curing, 96% for thermoforming, and 96% for the silos.

(b) The PM10 emissions from the polystyrene food packaging production line shall be limited to less than 7.75 pounds per hour or 33.95 tons per twelve (12) consecutive month period.

Compliance with this limit will render the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

Since emissions of PM and PM10 are equivalent, compliance with the PM limit established in 326 IAC 6-3-2 (Process Operations) will ensure compliance with the PM10 limit established in 326 IAC 2-8 (FESOP).

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to F001-7300-000032, issued on April 14, 1997, and 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the polystyrene food packaging production line, including the nine (9) silos and the final product storage operations, shall be limited to a total of 7.75 pounds per hour when operating at a process weight rate of 2.6 tons per hour. This limit was calculated by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Particulate Matter (PM)

Pursuant to F001-7300-00032, issued April 14, 2001 and in order to comply with Conditions D.1.1 and D.1.2, the baghouses for PM control shall be in operation at all times when the polystyrene food packaging production line is in operation.

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, in order to demonstrate compliance with Condition D.1.1(a) the Permittee shall perform VOC testing utilizing methods as approved by the Commissioner. This test shall be conducted on the thermal oxidizer to determine or verify the following capture efficiencies: 84% for curing, 100% for thermoforming, and 100% for the silos. The test shall also verify a minimum destruction efficiency of 96% for the thermal oxidizer. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

D.1.6 Regenerative Thermal Oxidizer

(a) From the date of issuance of this permit, until the approved stack test results are available, the Permittee shall operate the regenerative thermal oxidizer at or above the hourly average temperature of 1400 ^{0}F. The regenerative thermal oxidizer shall operate at all times that the thermoformers/molders, curing, and silos are in operation.

(b) The Permittee shall determine temperature and fan frequency from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.1 as approved by IDEM.

(c) From the date the approved stack test results are available, the Permittee shall operate the regenerative thermal oxidizer at or above the hourly average temperature and fan frequency as observed during the compliant stack test during operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.7 Thermal Oxidizer

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be at or above the hourly average temperature used to demonstrate compliance during the most recent compliance stack test.

(b) The fan frequency shall be observed at least once per week when the regenerative thermal oxidizer is in operation. When for any one reading, the fan frequency is outside the normal range of 41 to 43 hertz as established in the most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.8 Visible Emissions Notations

(a) Once per shift visible emission notations of the baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.9 Parametric Monitoring

The Permittee shall record the total static pressure drop across the filter just prior to the thermal oxidizer, at least once per shift when the polystyrene food packaging production line is in operation. When for any one reading, the pressure drop across the baghouses is outside the normal range of 1.0 and 6.0 inches of water or a range established established during the latest stack test. The Permittee shall take reasonable response steps in accordance with Section C - Compliance

Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.10 Baghouse Inspections

An inspection shall be performed within the last month of each calender quarter of all bags controlling polystyrene food packaging production line. All defective bags shall be replaced.

D.1.11 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.12 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the polystyrene input to the extruders and the input of butane as a blowing agent.

(b) To document compliance with Condition D.1. 7, the Permittee shall record the continuous temperature records (on an hourly average basis) for the regenerative thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test. The Permittee shall also maintain weekly records of the fan frequency.

(c) To document compliance with Condition D.1.8, the Permittee shall maintain records of once per shift visible emission notations of the baghouse stack exhaust when exhausting to the atmosphere.

(d) To document compliance with Condition D.1.9, the Permittee shall maintain once per shift records of the inlet and outlet differential static pressure during normal operation.

(e) To document compliance with Condition D.1.10, the Permittee shall maintain records of the results of the inspections required under Condition D.1.10.

(f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

(a) Paved and unpaved roads and parking lost with public access;

(b) Enclosed systems for conveying plastic raw materials and plastic finished goods;

(c) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;

(d) Gasoline generators not exceeding 110 horsepwer;

(e) Stationary fire pumps; and

(f) Emission units with PM and PM10 emissions less than five (5) tons per year, SO_2, NOx, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:

(1) One (1) butane compressed gas storage tank A, installed in 1990, with a capacity of 15,000 gallons; and

(2) One (1) idle nitrogen gas storage tank B, installed in 1972, with a capacity of 7,000 gallons, charged with nitrogen to inhibit corrosion.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

There are no specific regulations applicable to these activities.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Dolco Packaging
Source Address: 2110 Patterson Street, Decatur, Indiana 46733
Mailing Address: 2110 Patterson Street, Decatur, Indiana 46733
FESOP No.: F001-14652-00023

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Dolco Packaging
Source Address: 2110 Patterson Street, Decatur, Indiana 46733
Mailing Address: 2110 Patterson Street, Decatur, Indiana 46733
FESOP No.: F001-14652-00023

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Dolco Packaging
Source Address: 2110 Patterson Street, Decatur, Indiana 46733
Mailing Address: 2110 Patterson Street, Decatur, Indiana 46733
FESOP No.: F001-14652-00023
Facility: Polystyrene food packaging production line
Parameter: Polystyrene input
Limit: The source shall limit the input of polystyrene to the extruders to less than 16,783 tons per twelve (12) consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Dolco Packaging
Source Address: 2110 Patterson Street, Decatur, Indiana 46733
Mailing Address: 2110 Patterson Street, Decatur, Indiana 46733
FESOP No.: F001-14652-00023
Facility: Polystyrene food packaging production line
Parameter: Butane input
Limit: The source shall limit the input of butane as a blowing agent to less than 479 tons per twelve consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Dolco Packaging
Source Address: 2110 Patterson Street, Decatur, Indiana 46733
Mailing Address: 2110 Patterson Street, Decatur, Indiana 46733
FESOP No.: F001-14652-00023

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

September 11, 2002

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	Dolco Packaging
Source Location:	2110 Patterson Street, Decatur, Indiana 46733
County:	Adams
SIC Code:	3086
Operation Permit No.:	F001-14652-00032
Permit Reviewer:	ERG/KC

On April 10, 2002, the Office of Air Quality (OAQ) had a notice published in the Decatur Daily Democrat, Decatur, Indiana, stating that Dolco Packaging had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a stationary polystyrene extrusion plant with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On April 30, 2002, Dolco Packaging submitted comments on the proposed FESOP Renewal. The summary of the comments is as follows:

Comment 1:

The source noted that the original FESOP and this renewal draft requires compliance testing to verify the following individual capture efficiencies: 90% curing, 100% for thermoforming, and 100% for the silos; as well as the minimum destruction efficiency of 96% for the thermal oxidizer. The source agrees with the need to test to verify the destruction efficiency of 96% for the thermal oxidizer, but does not agree with the individual capture efficiency testing. The source requests that testing for the individual capture efficiencies be removed as well as any reference to those capture efficiencies.

The source believes the capture efficiencies can be determined by definition and therefore do not need to be verified in a test. Silos: The silos are 100% enclosed and all air that passes through them goes to the oxidizer. Therefore capture efficiency is 100%. Thermoformers: Demonstration of capture in the thermoformers can be done by the definition of permanent total enclosure. The thermoformers meet the requirements for such a claim found in USEPA Guidelines for Determining Capture Efficiency (January 9, 1995). The capture efficiency is 100%. Curing: The roll stock storage area is divided into a main storage area which contains most of the curing stock and a secondary staging/overflow area which contains a variety of materials, including scrap which emits butane at an extremely low rate. The main storage area with the curing operations meets the definition of permanent total enclosure and it is estimated that 84% of the total butane lost in all of the roll stock storage is emitted into this room. The room is 100% vented to the oxidizer. The source feels that testing for these individual capture efficiencies should be removed from the permit because they can be verified by definition.

Additionally, the source noted that the calculations display the correct capture efficiency for thermoforming, but Condition D.1.1(a) and D.1.5 of the permit do not. Page 5 of the TSD also shows the wrong capture efficiency. Additionally, Conditions D.1.1(a) and D.1.5 of the permit as well as the TSD calculations do not show the correct capture efficiency for curing. The curing capture efficiency should be 84%. Once the curing capture efficiency is corrected from 90% to 84%, the butane usage limit will need to be changed from 506 tons per year to 483 tons per year. The source would like these errors corrected.

Response to Comment 1:

After discussions between IDEM and Dolco Packaging, Dolco Packaging has agreed to keep the testing for the capture efficiencies in the permit. Dolco has spoken with their inspector to determine how they will demonstrate that they meet the individual capture efficiencies. The definition of total enclosure will be used to show compliance with the silo capture efficiency and the main storage area of the curing operation. A smoke test will be used to demonstrate inward air flow at all openings in the thermoformers to demonstrate compliance with the thermoformer capture efficiency.

The incorrect capture efficiency for thermoforming and curing was corrected in Conditions D.1.1(a) and D.1.5. Additionally, the overall efficiencies were corrected as they were calculated using the previous permit required destruction efficiency of 95%. The required destruction efficiency is now 96%. The butane input limit was also changed from 506 tons per year to 479 tons per year to ensure that VOC emissions for the source remain less than 100 tons per year with the corrected curing capture efficiency. The following changes were made as a result of this comment.

D.1.1 FESOP Limits [326 IAC 2-8]

Pursuant to F001-7300-00032, issued April 14, 2001, and 326 IAC 8-4 (FESOP), the following apply:

(a) The input of polystyrene to the extruders shall be less than 16,783 tons per twelve (12) consecutive month period and the input of butane as a blowing agent shall be less than ~~506~~ **479** tons per twelve (12) consecutive month period. The source shall operate the thermal oxidizer, with a destruction efficiency of ninety-six percent (96%), at all times that the thermoformers/molders, curing, and silos are in operation. This is equivalent to limiting the VOC emissions from the polystyrene food packaging production line to less than ninety-two (92) tons per year. This limit is structured such that when including VOC emissions from the remainder of the source, the source total VOC emissions remain below one hundred (100) tons per year. Therefore the requirements of 326 IAC 2-7 (Part 70 Permit), 326 IAC 2-2 (Prevention of Significant Deterioration), and 40 CFR 52.21 are not applicable.

In order to be in compliance with this limit, the thermal oxidizer shall operate at a minimum destruction efficiency of 96% and at the following capture efficiencies: ~~90~~ **84**% for curing, ~~95~~ **100**% for thermoforming, and 100% for the silos. The thermal oxidizer destruction and capture efficiencies together shall yield the following overall efficiencies: ~~85.5~~ **80.6**% for curing, ~~80.25~~ **96**% for thermoforming, and ~~95~~ **96**% for the silos.

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, in order to demonstrate compliance with Condition D.1.1(a) the Permittee shall perform VOC testing utilizing methods as approved by the Commissioner. This test shall be conducted on the thermal oxidizer to determine or verify the following capture efficiencies: ~~90~~ **84**% for curing, ~~95~~ **100**% for thermoforming, and 100% for the silos. The test shall also verify a minimum destruction efficiency of 96% for the thermal oxidizer. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C-Performance Testing.

IDEM acknowledges the incorrect capture efficiency for thermoforming and curing in the TSD. However, the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Please note that the capture efficiency for thermoforming should be 100% rather than 95% and the capture efficiency for curing should be 84% rather than 90% as it is stated in the TSD. Additionally, the butane usage limit should be 479 tons per year rather than 506 tons per year. The emission calculations from the packaging production line should be as follows:

Limit of material usage before control:

Polystyrene Usage =	16783	ton/yr
Butane =	479	ton/yr

These limits yeild the following emissions:

Emitted Into:	Gas Allocation Percentage	TPY in this area	Percent Capture	Percent DRE	TPY Destroyed	TPY Emitted
Roll Stock Storage	18.46	93.41	84	96	71.30	17.12
Thermoforming	20.88	105.65	100	96	96.01	4.00
Silos	0.88	4.45	100	96	4.05	0.17
Extrusion	3.74	18.92	0	0	0.00	17.91
Finished Product Storage	9.89	50.04	0	0	0.00	47.37
Retained in Product	46.15	233.52	0	0	0.00	0.00
Total from Butane						86.58
HAPS that are also VOC						5.27
Total VOC						91.85

Capture Efficiency

Roll Stock storage =	84.00%
Thermoformer Capture =	100.00%
Silos Capture=	100.00%

E. Total Controlled Emissions

Unit	PM	PM10	SO_2	VOC	CO	NO_x	HAPS
Polystyrene Manfuacturing Process	21.1	21.1	0	91.85	0	0	5.27
Thermal Oxidizer Combustion	0.2	0.2	0	0.1	1.8	2.2	Neg
Printing	0	0	0	7.4	0	0	Neg
Total Controlled Emissions	21.3	21.3	0	99.35	1.8	2.2	5.27

Comment 2:

The source noted that Condition D.1.9 (Parametric Monitoring) of the permit states that pressure drop readings shall be taken once per shift when the polystyrene food packaging production line is in operation when venting to the atmosphere. However, page 7 of the TSD simply states that the pressure drop readings shall be taken once per shift when the polystyrene food packaging production line is in operation. The

source requests that page 7 of the TSD should be corrected to state that the readings are only necessary when venting to the atmosphere.

Response to Comment 2:

Because this emission unit always vents to the atmosphere and is never redirected to vent inside a building, it is not necessary to specify "when venting to the atmosphere". Therefore, the following changes have been made to the permit:

D.1.9 Parametric Monitoring

The Permittee shall record the total static pressure drop across the filter just prior to the thermal oxidizer, at least once per shift when the polystyrene food packaging production line is in operation ~~when venting to the atmosphere~~. When for any one reading, the pressure drop across the baghouses is outside the normal range of 1.0 and 6.0 inches of water or a range established established during the latest stack test. The Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.10 Baghouse Inspections

An inspection shall be performed **within the last month of** each calender quarter of all bags controlling polystyrene food packaging production line ~~when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors.~~ All defective bags shall be replaced.

D.1.12 Record Keeping Requirements

(d) To document compliance with Condition D.1.9, the Permittee shall maintain once per shift records of the inlet and outlet differential static pressure during normal operation ~~when venting to the atmosphere~~.

(e) To document compliance with Condition D.1.10, the Permittee shall maintain records of the results of the inspections required under Condition D.1.10~~ and the dates the vents are redirected~~.

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the
desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Please note that page 7 of the TSD should state that the pressure drop readings are only required when venting to the atmosphere.

Comment 3:

The source noted that the stated maximum ink usage in the unit descriptions in Conditions A.2(b), the facility description portion of Section D.1, the TSD, and the Emission Calculations in Appendix A is incorrect. The maximum ink usage should be 28,000 pounds per year, not 280,000 pounds per year. The source would like this error to be corrected.

Response to Comment 3:

The following changes were made as a result of this comment:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(b) Eight (8) offset printers, constructed in 1972, with a combined maximum ink usage of ~~280,000~~ **28,000** pounds per year.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(b) Eight (8) offset printers, constructed in 1972, with a combined maximum ink usage of ~~280,000~~ **28,000** pounds per year.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Appendix A: Emission Calculations
Emission Calculations
Company Name: Dolco Packaging
Address City IN Zip: 2110 Patterson Street, Decatur, Indiana 46733
Plant ID: 001-00032
Permit Number: F001-14652-00032
Reviewer: ERG/KC
Date: 10/9/2001

A. Eight (8) Offset Printers:

Ink VOC emissions = (~~280,000~~ **28,000** lb ink/yr) * (10%) * (ton/2000 lb) = 1.4 ton/yr

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Please note that the maximum ink usage in the unit description section of the TSD should read 28,000 instead of 280,000 pounds per year.

Comment 4:

The source noted that the quarterly report form for butane usage is incorrect. The form lists the limit as 455 tons per year while the remainder of the permit and TSD state the limit as 506 tons per year. The source would like this error to be corrected.

Response to Comment 4:

As a result of Comment 1, the butane usage limit has been changed from 506 tons per year to 479 tons per year. Thus, the following change was made as a result of this comment:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name:	Dolco Packaging
Source Address:	2110 Patterson Street, Decatur, Indiana 46733
Mailing Address:	2110 Patterson Street, Decatur, Indiana 46733
FESOP No.:	F001-14652-00023
Facility:	Polystyrene food packaging production line
Parameter:	Butane input
Limit:	The source shall limit the input of butane as a blowing agent to less than ~~455~~ **479** tons per twelve consecutive month period.

Upon further review, IDEM, OAQ made the following changes to the permit. The Table of Contents was updated as needed.

1. For clarification purposes, the following changes were made to Conditions D.1.6 (Regenerative Thermal Oxidizer), D.1.7 (Thermal Oxidizer), and D.1.12 (Record Keeping Requirements).

D.1.6 Regenerative Thermal Oxidizer

(a) From the date of issuance of this permit, until the approved stack test results are available, the Permittee shall operate the regenerative thermal oxidizer at or above the hourly average temperatuer of 1400 ^{0}F. The regenerative thermal oxidizer shall operate at all times that the thermoformers/molders, curing, and silos are in operation. ~~When operating, the thermal incinerator shall operate at a minimum temperature of 1400 ^{0}F and a fan frequency of 41 to 43 hertz during operation or the temperature and fan frequency determined in the most recent stack test. This temperature and fan frequency correlates to a destruction efficiency of 96%.~~

(b) The Permitee shall determine temperature and fan frequency from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.1 as approved by IDEM.

(c) From the date the approved stack test results are available, the Permittee shall operate the regenerative thermal oxidizer at or above the hourly average temperature and fan frequency as observed during the compliant stack test during operation.

D.1.7 Thermal Oxidizer

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be ~~greater than or equal to the~~ **at or above the hourly average** temperature used to demonstrate compliance during the most recent compliance stack test.

(b) The fan frequency shall be observed at least once per week when the **regenerative** thermal oxidizer is in operation. **When for any one reading,** ~~This~~ **the fan** frequency ~~shall~~

~~be maintained within the~~ **is outside the normal** range of 41 to 43 hertz **as established in the most recent compliant stack test, the Permittee shall take reaonsable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports.** ~~or the range as established in the most recent compliance stack test.~~ **A reading that is outside the above mentioned range is not a deviation from this permit.**

~~(c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading.~~ Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.12 Record Keeping Requirements

(b) To document compliance with Condition D.1. 7, the Permittee shall record the continuous temperature records **(on an hourly average basis)** for the~~ catalytic incinerator~~ **regenerative thermal oxidizer** and the temperature used to demonstrate compliance during the most recent compliance stack test. The Permittee shall also maintain weekly records of the fan frequency.

2. After discussion with the Permittee, the requirement to monitor the pressure drop across the nine silo baghouses was removed. The silo baghouses have no fan and therefore the pressure drop would always be zero. The nine silo baghouses vent to the oxidizer filter and then to the oxidizer. Monitoring of the oxidizer filter would be more appropriate to indicate possible problems. Therefore, Condition D.1.9 was altered to require parametric monitoring of the filter prior to the oxidizer. A pressure drop of 1.0 to 6.0 was agreed to be appropriate.

D.1.9 Parametric Monitoring

The Permittee shall record the total static pressure drop across the ~~baghouses used in conjunction with the polystyrene food packaging production line~~ **the filter just prior to the thermal oxidizer**, at least once per shift when the polystyrene food packaging production line is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouses is outside the normal range of ~~4.0~~ **1.0** and ~~12.4~~ **6.0** inches of water or a range established established during the latest stack test. The Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

September 11, 2002

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	Dolco Packaging
Source Location:	2110 Patterson Street, Decatur, Indiana 46733
County:	Adams
SIC Code:	3086
Operation Permit No.:	F001-14652-00032
Permit Reviewer:	ERG/KC

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Dolco Packaging relating to the operation of a polystyrene extrusion plant. Dolco Packaging was issued FESOP 001-7300-00032 on April 14, 1997.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) polystyrene food packaging production line consisting of the following:

(1) Nine (9) silos for regrind flake recycling, constructed in 1972, with maximum capacities included in a confidential file, each equipped with a baghouse to control particulate emissions;

(2) One (1) natural gas fired regenerative thermal oxidizer, constructed in 1998, with a maximum capacity of five (5) million British thermal units per hour, to control VOC emissions from thermoforming/molding and the curing room which were constructed in 1972;

(3) Uncontrolled extrusion and final product storage operations, constructed in 1972, with maximum capacities included in a confidential file;

(b) Eight (8) offset printers, constructed in 1972, with a combined maximum ink usage of 280,000 pounds per year.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new emission units and pollution control equipment receiving new source review approval.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Paved and unpaved roads and parking lost with public access;

(b) Enclosed systems for conveying plastic raw materials and plastic finished goods;

(c) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;

(d) Gasoline generators not exceeding 110 horsepower;

(e) Stationary fire pumps; and

(f) Emission units with PM and PM10 emissions less than five (5) tons per year, SO_2, NOx, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:

(1) One (1) butane compressed gas storage tank A, installed in 1990, with a capacity of 15,000 gallons; and

(2) One (1) idle gas storage tank B, installed in 1972, with a capacity of 7,000 gallons, charged with nitrogen to inhibit corrosion.

Existing Approvals

(a) AA001-9261-00032, issued on November 6, 1998; and

(b) F001-7300-00032, issued on April 14, 1997 and expiring on April 14, 2002.

All conditions from previous approvals were incorporated into this FESOP except the following:

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on July 12, 2001.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (page 1 through 4). These calculations were taken from F001-7300-00032, issued April 14, 1997.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	2108
PM-10	2108
SO_2	0
VOC	297
CO	1.8
NO_x	2.2

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Styrene	4.67
Ethylbenzene	0.65
Benzene	4.599×10^{-5}
Dichlorobenzene	2.628×10^{-5}
Formaldehyde	1.643×10^{-3}
Hexane	3.942×10^{-2}
Toluene	7.446×10^{-5}
Lead	1.095×10^{-5}
Cadmium	2.409×10^{-5}
Chromium	3.066×10^{-5}
Manganese	8.322×10^{-6}
Nickel	4.599×10^{-5}
TOTAL	5.36

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC and PM10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on April 14, 1997, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect

of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F001-7300-00032; issued on April 14, 1997).

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_X	Total HAPs
Polystyrene food packaging production line (controlled silos, thermoforming/molding, and curing room; uncontrolled extrusion and production storage)	33.95 (326 IAC 6-3-2)	33.95 (326 IAC 6-3-2)	0	Less than 92 (FESOP)	0	0	5.32
Thermal Oxidizer Combustion	0.2	0.2	0	0.1	1.8	2.2	Neg
Printing	0	0	0	7.4	0	0	Neg
Total PTE After Issuance	Less than 100	Less than 100	0	Less than 100	1.8	2.2	6.1

County Attainment Status

The source is located in Adams County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC and emissions are considered when evaluating the rule applicability relating to the ozone standards. Adams County has been designated as attainment or unclassifiable for ozone.

(b) Adams County has been classified as attainment or unclassifiable for PM10, SO_2, NO_2, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. 40 CFR Part 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984) does not apply to the insignificant storage tanks because they were constructed and modified prior to the applicability date of this rule.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The polystyrene food packaging production line, including the nine (9) silos, one (1) regenerative thermal oxidizer, and extrusion and final product storage operations, and eight (8) printers were all constructed in 1972 and pre-date 326 IAC 2-2 (Prevention of Significant Deterioration). Therefore, this source is not subject to 326 IAC 2-2.

326 IAC 2-4.1-1 (New Sources of Hazardous Air Pollutants)

326 IAC 2-4.1-1 (New Sources of Hazardous Air Pollutants) does not apply to this source because the source was constructed prior to the applicability date of this rule, July 27, 1997, and is not a major source of HAPs.

326 IAC 2-6 (Emission Reporting)

This source is located in Adams County and the potential to emit of PM10 and VOC is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8 (FESOP)

Pursuant to 326 IAC 2-8 (FESOP), the following requirements apply:

(a) The input of polystyrene to the extruders shall be less than 16,783 tons per twelve (12) consecutive month period and the input of butane as a blowing agent shall be less than 506 tons per twelve (12) consecutive month period. The source shall operate the thermal oxidizer, with a destruction efficiency of ninety-six percent (96%), at all times that the thermoformers/molders, curing, and silos are in operation. These limits are equivalent to limiting the VOC emissions from the polystyrene food packaging production line to less than ninety-two (92) tons per year. This limit is structured such that when including VOC emissions from the remainder of the source, the source total VOC emissions remain below one hundred (100) tons per year. Therefore the requirements of 326 IAC 2-7 (Part 70 Permit), 326 IAC 2-2 (Prevention of Significant Deterioration), and 40 CFR 52.21 are not applicable.

In order to be in compliance with this limit, the thermal oxidizer shall operate at the following capture efficiencies: 90% for curing, 95% for thermoforming, and 100% for the silos. The thermal oxidizer and capture efficiencies together shall yield the following overall efficiencies: 85.5% for curing, 80.25% for thermoforming, and 95% for the silos.

(b) The PM10 emissions from the polystyrene food packaging production line shall be limited to less than 7.75 pounds per hour or 33.95 tons per twelve (12) consecutive month period. Compliance with this limit will render the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

Since emissions of PM and PM10 are equivalent, compliance with the PM limit established in 326 IAC 6-3-2 (Process Operations) will ensure compliance with the PM10 limit established in 326 IAC 2-8 (FESOP).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15)

minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-3-2 (Process Operations)

Pursuant to F001-7300-000032, issued on April 14, 1997, and 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the polystyrene food packaging production line, including the nine (9) silos and the final product storage operations, shall be limited to a total of 7.75 pounds per hour when operating at a process weight rate of 2.6 tons per hour. This limit was calculated by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The baghouses shall be in operation at all times the polystyrene food packaging production line is in operation, in order to comply with this limit.

Emissions of PM and PM10 are equivalent. Therefore the PM limit established in 326 IAC 6-3-2 also limits PM10 emissions less than 7.75 pounds per hour (33.95 tons per twelve (12) consecutive month period). Compliance with this limit ensures compliance with 326 IAC 2-8 (FESOP).

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

(a) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) does not apply to the polystyrene food packaging production line even though it has the potential to emit greater than twenty-five (25) tons per year of VOC because it was constructed and modified prior to the applicability date of the rule, January 1, 1980.

(b) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) does not apply to the offset printers because they do not have the potential to emit greater than twenty-five (25) tons per year of VOC and they were constructed and modified prior to the applicability date of the rule, January 1, 1980.

326 IAC 8-2 (Surface Coating Emission Limitations)

326 IAC 8-2 (Surface Coating Emission Limitations) does not apply to this source because this source is located in Adams County, was constructed prior to 1980, and is limiting the potential to emit of VOC to less than one hundred (100) tons per year.

326 IAC 8-5-5 (Graphic Arts Operations)

326 IAC 8-5-5 (Graphic Arts Operations) is not applicable to this source because the source is located in Adams County and was constructed and modified prior to the applicability date of the rule, November 1, 1980.

326 IAC 8-6 (Organic Solvent Emission Limitations)

326 IAC 8-6 (Organic Solvent Emission Limitations) is not applicable to this source because the source is located in Adams County, was constructed and modified prior to October 7, 1974, and is limiting VOC emissions to below one hundred (100) tons per year.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) does not apply to this source because the source is located in Adams County.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) is not applicable to this source because it is located in Adams County. This rule only applies to storage vessels in Clark, Floyd, Lake or Porter County.

Testing Requirements

VOC testing was included in the original FESOP and is included in this FESOP in order to ensure compliance with 326 IAC 2-8. Testing is required to ensure a minimum destruction efficiency of 96% for the thermal oxidizer. Testing is also required to verify the following capture efficiencies: 90% for curing, 95% for the thermoforming, and 100% for the silos.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

1. The polystyrene food packaging production line has applicable compliance monitoring conditions as specified below:

   (a) Once per shift visible emissions notations of the baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a violation of this permit.

   (b) The Permittee shall record the total static pressure drop across the baghouses controlling the polystyrene food packaging production line, at least once per shift when the line is in operation. When for any one reading, the pressure drop across

the baghouses is outside the normal range of 4.0 to 12.4 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a violation of this permit.

(c) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

(d) The fan frequency shall be observed at least once per week when the thermal oxidizer is in operation. This frequency shall be maintained within the range of 41 to 43 hertz or the range as established in the most recent compliance stack test.

These monitoring conditions are necessary because the baghouses and thermal oxidizer for the polystyrene food packaging production line must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this Dolco Packaging shall be subject to the conditions of the attached proposed FESOP No. 001-15652-00032.

Appendix A: Emission Calculations
Emission Calcualtions
Company Name: Dolco Packaging
Address City IN Zip: 2110 Patterson Street, Decatur, Indiana 46733
Plant ID: 001-00032
Permit Number: F001-14652-00032
Reviewer: ERG/KC
Date: 10/9/01

A. Eight (8) Offset Printers:
Note: It is assumed that all VOC from the ink is flash off since the applicant cannot identify the type of offset printers used

Ink VOC emissions = (280,000 lb ink/yr) * (10%) * (ton/2000 lb) = 1.4 ton/yr
Crystal Clean = (1.65 lb crystal cleen/hr) * (83%) * (8760 hr/yr) * (ton/2000 lb) = 6.0 ton/yr

Methodology: Emissions = usage rate, lb/hr * % VOC by wt * 8760 hr/yr * ton/2000 lb

B. Source Wide Particulate Matter (PM) Emissions:

Baghouse control efficiency: 99%
Nine Baghouse PM controlled emissions = (2400 acf/min) * (0.026 gr/acf) * (60 min/hr) * (lb/7000 gr) * (8760 hr/yr) * (ton/2000 lb) * (9 baghouses) = 21.1 ton/yr
Nine Baghouse PM Uncontrolled emissions = (21.1 ton/yr) / (1-.99) = 2108 ton/yr

C. Controlled VOC emissions

Limit of material usage before control:
Polystyrene Usage = 16783 ton/yr
Butane = 506 ton/yr

HAP Emissions
Resin Use: 10542 tons

HAP	Emission Factor	Emissions (ton/yr)
Styrene	0.000443	4.67
Ethyl Benzene	0.000062	0.65

These limits yeild the following emissions:

Emitted Into:	Gas Allocation Percentage	TPY in this area	Percent Capture	Percent DRE	TPY Destroyed	TPY Emitted	
Roll Stock Storage	18.46	93.41	90	96	80.70	12.70	
Thermoforming	20.88	105.65	100	96	101.43	4.23	
Silos	0.88	4.45	100	96	4.27	0.18	
Extrusion	3.74	18.92	0	0	0.00	18.92	
Finished Product Storage	9.89	50.04	0	0	0.00	50.04	
Retained in Product	46.15	233.52	0	0	0.00	0.00	Leaves in Product
Total from Butane						86.08	
HAPS that are also VOC						5.27	
Total VOC						91.35	

Destruction Efficiency
Thermal Oxidizer Destruction = 96.00%

Capture Efficiency
Roll Stock storage = 90.00%
Thermoformer Capture = 100.00%
Silos Capture= 100.00%

Appendix A: Emission Calculations
Emission Calcualtions
Company Name: Dolco Packaging
Address City IN Zip: 2110 Patterson Street, Decatur, Indiana 46733
Plant ID: 001-00032
Permit Number: F001-14652-00032
Reviewer: ERG/KC
Date: 10/9/01

D. Total Uncontrolled Emissions

Unit	PM	PM10	SO_2	VOC	CO	NO_x	HAPS
Polystyrene Manfuacturing Process	2108	2108	0	281.8	0	0	5.27
Thermal Oxidizer Combustion	0.2	0.2	0	0.1	1.8	2.2	Neg
Printing	0	0	0	7.4	0	0	Neg
Total Uncontrolled Emissions	2108.2	2108.2	0	289.3	1.8	2.2	5.27

E. Total Controlled Emissions

Unit	PM	PM10	SO_2	VOC	CO	NO_x	HAPS
Polystyrene Manfuacturing Process	21.1	21.1	0	91.35	0	0	5.27
Thermal Oxidizer Combustion	0.2	0.2	0	0.1	1.8	2.2	Neg
Printing	0	0	0	7.4	0	0	Neg
Total Controlled Emissions	21.3	21.3	0	98.85	1.8	2.2	5.27

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: **Dolco Packaging**
Address City IN Zip: **2110 Patterson Street, Decatur, Indiana 46733**
Plant ID: **001-00032**
Permit Number: **F001-14652-00032**
Reviewer: **ERG/KC**
Date: **10/9/01**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
5.0	43.8

Pollutant

	PM*	PM10*	SO_2	NO_x	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.2	0.2	0.0	2.2	0.1	1.8

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions
Company Name: Dolco Packaging
Address City IN Zip: 2110 Patterson Street, Decatur, Indiana 46733
Plant ID: 001-00032
Permit Number: F001-14652-00032
Reviewer: ERG/KC
Date: 10/9/01

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.599E-05	2.628E-05	1.643E-03	3.942E-02	7.446E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.095E-05	2.409E-05	3.066E-05	8.322E-06	4.599E-05

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

gasc99.wk4 9/95
updated 4/99